### Case 516-ov-00143-JRH-RSB Document 1 Filed 10/24/16 Page 1 of 20 FOR THE SOUTHERN DISTRICT OF GEORGIA STATEBORD DIVISION

EARWEST CLAYTON

CV616-143

CIVIL ACTION NO

COMPLAINT

(11 STANLEY WILLIAMS

(21 Emnatt Donahue Us John Doel) 30. Zimmermun

BIDENNISMUTTY (4) Jine Down

VS Allen

31. Osborne 32. Robert Tooles

MISmith 51 Joyce

16 Allen UTI Williams

34 John Due 1

4) Housler

(181 Williams

35 John Doe2 36 John Dues

715hoemule (d) Nuthan Deal

1(4) 4411 (30) H(1)

37 John Due3 38 June Due 1

39 June Du 2

GI Davidson

(151 Kearins

10) Brun Chumber

177 Musty Kllen

11) Shurp

(11) Shuip

(12) Brian Owers

ays etal.,

I. GENERAL INFORMATION

1. Your full name and prison number appointermation and belief Earnest Barnard Clayton - 957639

2. Approximate dute your sentence will be completed upon information and belief in2065

### II. PREVIOUS LAWSUIT

3. Other than the appeal of your conviction or sentence, howeyou ever submitted a lawsuit farfilling in any federal or state court dealing with the same facts involved in this law Shit or other wise related to your imprison ment? uponinto mution and belief, yes

### III. PRESENT CONFINEMENT

4. Where are you now contined? aparinformation unabelief. Georgia State Prison

5. Did you present your camplainto herein to the institution as a grievance? upon information and belief yes

TIL. PHRITES 10 THIS LAWSUIT
6. List the name and address of each plaintiff in this lawsuit
Earnest Clayton
upuninformation and belief, Georgia State Prison, 3001st the south
Reidswille Georgia 30153
a de la companya de l
7. List the name of each defendant in this lawsuit.
(A) apon information and belief. Dennis Marry was a correction at office at G.S.P.
Collegen intermetion and belief, Emmitt Donahue was a Lieutenant at G.S.P.
(c) Upon information and belief, Brean Chumbers was a Unit Manger at 6.5.19
(E) upon information and belief, Sharp Gus a Lieutenant at G.S.P.  (E) upon information and belief, Zimmer mun was a correctional officer at G-S.P.
o super internation and belief Osharna curs Catalonastaset Casip.
The investigation was been allessed to the second of the s
Depurtment of Corrections, stomer Bryson cous chase, is the commissioner of Georges
(I) Uponintor mution and belief. Robert Tooles was a stall member of GDOC or Georgia De partment of Corrections
(1) Upon intermedian and belief Down, was and love is a warden of Sat - at G.S.P.
(K) Upon information and bestel, Marty Allen is now the worden of G.S.P.
in what I use with compared there is an a constant of the contraction
(M) Upon into mution and belief, Brian Owens was the commissioner of Georgia Depart

- a Depurt-
- (W) Upon information and belief. Mathan Dealusther Coveror of Georgia.
- (O) upon information and belief, Davidson was a carrectional officer at Georgea (P) Upon information and belief Smith was a Unit Manyer at G.S.P.
- (a) Upon into motion and belief Allen was a correctional officer at Gerryia 15) upon information and belief, balliums was a correctional officer at Georgea
- T) Upon intermedian und belief williams was a correctional officer at Georgia.
- a) upon into ination and belief John Due was the dude who tix some of conditions in Cell-05-01-401W 1291 6-5.4.
- (V) Upon information and belief, Lee was a correction of office at 6.8.P.
- (m) aparentonnational belief Harlod Flower was a correct bank office at G.J.P.

Eachi desendant 15 outed inthis or ther individually cap

On dutes between November 1, or 2014 and October 18, or 2016 Third more than one grievance form about more than one issue which was related to me and/or conditions of my confinement.

10.

upon information and belief, atalltimes from the time in may of 2015, when I was first getting placed incell-05-of-dorm K-2 at 6.5.P. through 3:00 a.m. on the duke in September or October of 2015 when I was first getting placed in cell-04-of-dorm K-2 at 6.5.P. I had no suntury meanus of disposing mybowel movement (5) therefore prevented me basic human needs and for need.

upon information and belief, at all times from the time in may at 2015, when I was first getting placed incell-05-of-doing K. 2 allows through 3:00 a.m on the date in September or October of 2015 when I was first getting placed in cell-04-of-doing K-2 at 6.5.P. cell-05-of-doing K-2 at 6.5.P. had one or more in a dequate plumbing 185 acus with the toilet incell-05-of-doing K-2 at 6.5.P. had one the toilet 5y stem to the toilet in cell-05-of-doing K-2 at 6.5.P. which caused and for prevented the cantents whith was on the inside of the toilet incell-05-of-doing K-2 at 6.5.P. from be in y flusting. Also I swifeed dix this at, and being thirsty for extending during the time as de Scribed in paragraph, and due to the conductions of not being when when I need and when I want

At all times from the time in may of 2015, when I was first getting placed in cell-05-of-doink aut G.S.P. through 3:00 a in on the date in september or 0 ctober of 2015, when I was first getting placed incell-04-of-doink-2 at G.S.P. the Inside, of the Forlet incell-05-of-doin N-2 at G.S.P. was extremely filtry with so much contaminated water consisting of somuch of another person and for some one else's feces and wrine.

At all times tram the time in Muy of 2017, when I first had bowel movement in the talet in cell-05-of-doink-2 ut 6:5:8 through 3:00 uin on the dule in September or October of 2015 when I was first getting placed in cell-04-of-dorm K-2 at 6.5.P. The inside at the talet incell-05-of-dorm K-2 at 6.5.P. was extremely filtry with so much contaminated water consisting of so much of my teces and wrine along with so much of another person and for some one else's feces and wrine.

14

Upon information und belief, at all times from the time in may of 2015. When I was first getting placed in cell-05-of-doing K 2 at 6.5. F. through 3:00 a. months date in September or October of 2015 when I was first getting placed in cell-04-of-doing K-2 at 6.5. F., cell-05-of-doing in y 41 G:5. F. had one or more incide quite plumbing 155 act with the trot and cold running water plumbing 155 act 6.5. F. which caused and 10 i pre vented the trot and cold running water 5 yilem from running and and 10 i pre christing water and or trot and for cold water and for trotain cold running water and for the order and for trotain cold running water and for the order and for need, Also I suffred different order and direction and allowed with a cold and to prove a former was a described in this proprietable course a was not allowed as a from the order and so the direction of the cold of the provention and allowed with the provention of the course of the provention and allowed with the provention and allowed with the provention of the provention and allowed with the provention

upon information and belief the tree two list program 5 0.8. Inducated that the tree two (2) program is established to protect stall rullenders and the publication allender who commit a lead other to commit violent disruptive predictory, or riol rous activation or otherwise pose a serious threat to the sufely and security of the institutional operational The Candidian 8 at my cantine both. at G.S.A. had methinking that was going to die and that people was giring to hall me.

Each defendant is sued in his and her individually capacity, only.

Upon information and belief, at the time relevent to defendant actions; defendantial rechlessly and/or intentionally and/or delibrately direcycled anexcessive risk of serious harm to my health and/or swety.

uponister mution and beher, at the timew relevent to desendantial actions in this cuse, desendantial rechlessly and/or intentionally and delibrately clisted and excessive rish of serious harm to my healthand and/or swety which the conditions of my confinement pared to my health and/or swety

upon information and helies defendant Marty Milen defendant Homer Bryson defendant Robert tooles, defendant Harold Flower, John Doews und/or June Doewn sittles hiessia and/or intentionally and delibrately disregarde a Moswn ruk of serious harm to my treath and/or Swety. As a result of these conditions of my confinement I suffered and is swifer in yextreme emotional distress.

aponintormation and ballo, desendant Marty Allen, desendant Home Bryson and desendant Robert tooles. Is intentionally discriminated - against me, because of the one or more grievance form & had I tited between the time in November of 2014, when I first filed a grievance form at 6.5. P. and October 18, of 2016.

On a date Detween December 1, of 2015, and October 18, of 2016. Items and must provide a grevance appeal form for the grevance I filed in December of 2015, when I alleged Zimmer man and Osborne Illegal conductor using excessive force against me threefore I was not allow accessto gresunce appeal procedure for the cy levance form that I filed in December of 2015. alleging Exammerman and or borne illegal action of using excessive force against me and or borne illegal action of using excessive force against me appropriate and baller, every day from the time in 2016, when I was first moved to cell of of dorm 6.4 at 6.5. P through 3000 on October 18, oldole Gaboc personnely probabed most inmutes and be so offender in general population, from the inmute which I was force and or subjected to live in a cell-with during this time as described in this purgraph

upon into matur and belief. The tieral two Troysum & OP, Indicated that as signment to dury into two disprogram is regard as hazardows. Personateles are expedied to detail professionally with ampleasant and irrational behavior.

aponinformation and belief, everyday from the time in 2015 or 2016, when I was first Moved to cell-22-of-doin 6-12 at 6.5.10 through 3:00 a.m on the date in 2016, when I was not allow buch in cell-22-of-dorme-4-at 6.5.10 I was forced and/or 5ubjected to the invaluable with another immule who GADOC personnelualleged as a inmule who commit or lead of her to commit or otherwise pole lead of her to commit violent, disruptive, predating to the flows action or otherwise pole a serious threat to the such y and security of the institutional operation of

Ondules between the time in miny stable. When I was hist getting pluced in cell-05-of-derm K-2 of 6.5. P. and 3:00 a.m on the dule in september or October of 2015. When I was hist getting pluced in cell-05-of-derm K-2 of 6.5. P. while I was in cell-05-of-dorm K-2 of 6.5. P. while I was in cell-05-of-dorm K-2 of 6.5. P. I nothed Stundey Williams, Emmitt Donahue, Zimmer mun, Joyce, Brian Chumbers, Shurp, Davidson, Hairis, Osbarne, Shoemaker, Williams, Smith Chumbers, Shurp, Davidson, Hairis, Osbarne, Shoemaker, Williams, From Herd John Doels) Tane Doels) Hill, Hall, Hausier, Dennis mairy, Allen, Brown, Herd Hall, Hill, Williams, Allen, I that cell-05-of-dorm K-2 at G.S. P. toilet, had feces and arine of another person's and for sumeone else's init, and that Fees and arine of another person's and for sumeone else's init, and that I had no access to running any that the toilet in side of cell-05-of-dorm K-2 at G.S. P. did not that cell that the toilet in side of cell-05-of-dorm K-2 at G.S. P. did not that cell entire that and cold water while I was continued in my assigned cell, and that cell of of and cold water while I was extract youthy and smelly.

On dules between the time in Mayember of 2014, when I first filed a greenince form and December 300 f 2015. I repeatly informed Stunley williams, John Doels, Guards Emmit Donahue, Home, Bryson Rubert Tooles, Shurp, Duris, Lee, and some more of will members that I fewed Theoretical be serround by consther in mule and/or other inmules

Everyday from the dule in 2016 when I was first getting placed in cell-09. of down G.-4 at G.S.P. this wy h 3:00 on the dule who choker 18, of 2016. I was forced and for subjected to live and cell houder a is make who GROW. Is protecting most I monate in General population from

On colored tween the time in 2016, when I wustively getting place in cell-09-of doing of the bill and October 18, of 2016, the inmule who I was assigned on the bjected to cell mule with attached me while I was skeep, leaving scars and rusted, an my tack, chest, and aim, and caused me extreme pain and treatheries. Also as a result of my assigned cell mule attacks, I sulfred and treatheries. Also as a result of my assigned cell mule attacks, I sulfred so that in the back of my head and mouth scar in the back of my head and mouth the Everyday from the time wheth I was first placed in cell-os or doin K. Sat G.S. P. through 3:00 c.m on the days in September a of the back of september a of the back of september as of the back of september and sols, when I was first getting placed in cell-of of doin K. Sat G.S. P. I was extremely discontinuousle.

Ondules between the time in November of 2014, when I first filed a grievance form at 6.8.P and Octobe (BB) 2016. Stanley billiams. Zimmer man, Smith, Emmitt Donghue, Brian Chambers, Osborne, Boardson, Grand Neurins, made threats to me that they was going to have metruner to Hay stake Prison and love Georgia That they was going to have metruner to Hay stake Prison complainting Diagnostic Stake Propo because I filed a grievance form complainting Ondules between the time in November of 2014, when I was first camplainting Ondules between the time in November of 2014, when I was first camplainting of about one or more issues which was related to me and/or the condition of my continement and october 18, of 2016, the conditions of my confinement and october 18, of 2016, the conditions to my treatith and which posed an excessive risk of haim to my treatith and/or Butty had analytic effect on my mental stability

on dutes between the time in November of 2014, when I lided a grievance form at 6.5. P into October 18, of 2016, Brian Chamber's Stanley williams. Zimmer man, Smith, Donahue; Osborne, made threats that they was going to get me hait by another in make and made Serious threats that they was going to Serious haim me, because I liked a grievance form complainting.

On dules between the sime in November of Auly, when I forst filed a arrevance to mate & iP and December 28, of Auls, I Informed and for notified - , Stunden Williams, Robert Tooles about Brian Chumber, Emmitt Denahar, Osborne and Johnand June 100001 was retained in against me

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Un dates between the timera November of 2014, when I first filed a grievance formul G.S.P. and October 18 of 2016, the conditions of my continement had an adversed lock on my smental stabily.

Everyday between the time in may a facis, when I was first geting placed in cell-05-al-dornk act G.S.P through 3:00 and attendence of cell-05 al-dornk act G.S.P through G.S.P. everytime when I wring ted in the tolet inside at cell-05-al-dornk-2 at G.S.P., the extremely lithy contaminated water which inside of the tolet of a cell-05-al-dornk-2 at G.S.P. the extremely the tolet on to my seets, leys and on to the sloor of sell-05-eol-dornk-2 at G.S.P..

Everyday between the time in may or 2015, when I countrit getting placed moell-os-of-downk? at G.S. l. through 3'ill amon the date in September or October of 2015. when I was first getting placed in cell-O4-of-down k 2 at G.S. l. Everytime, when I wrin a led in the tiplet in side of cell-o5-of-downk-2 at G.S. l. The extremely fitting continuous water which was inside of tollet I Habit O5-of-downk-2 at G.S. l. Splushed from out of the fold incell-o5-of-downk-2 at G.S. l. Onto my feet 5, ley 5 and the floor of cell-o5 of-downk-2 at G.S. l. Onto my feet 5, ley 5 and the floor of cell-o5 of-downk-2 at G.S. l. Onto my feet 5, ley 5 and the floor of cell-o5 of-downk-2 at G.S. l. because there was 50 much extreme filthry water in the failet in cell U5-of-downk-2 at G.S. l.

Every day between the time in may of 2015, when I weiting getting place incell-05-of-dointed at G.S.P. Howard 3:00000 hadded in September or October of 2015, when I was first getting placed in cell 04-of-doin N-2 at G.S.P. rashes and/or severe raines, developed on my legs. Rests. hunds, buttlock as genily 15% and or private area parts of my body which causes me to inten very budy. Secure of extremely 11Hmy contains nated with addict was in the torset in cell-05-01-doin N-2 at ars. Product accurate on my rects 10-5-and or gental 38. When I was first getting placed incell as-of-doin N-2 at G.S.P. when I was first getting placed incell as of G.S.P. through 3:00 am on the date in september or October of 2015 when I was first go thing placed incell of SiP. through 3:00 am on the date in september or October of 2015 when I was first go thing placed incell of SiP. through 3:00 am on the date in september or October of 2015 when I was first go thing placed incell the Joletine No. 3 at G.S.P. because of the extremely 11Hmy containing to early which was in the following leets, legs, hands, grenital and or of or doin N-2 at G.S.P. September only 11Hmy containing to have and buttacker and of private area partitle my body, my feets, hands, legs, gentit a harand buttacker and or private area partitle of my body developed severe some and rushes, which caused me Severe and extreme pain.

Everything between the time in may of 2015, when & was first getting placed in cell-05-01-doing K-2 at 6.6. P. through 3:000, months date in September or October of 2015, when & was first getting placed in Cell-04-01-doing K-2 at 6.5. P. I was unusilly ryly and los unwill lay — subjected anythrough and los exposed to the unsunitury condition & cell-05-01-doing K-2 at 6.1.0

Of a do in K. 2 at Gis. P

39

Everyday between the time in may of 2015 rather I was first getting placed in cell-04-of-do in 8. 2 at Get of a men 3:00 aim on the date in septender or october or 2016 when I was fixed by discombot to me K. 2 at U.S. Phaled in cell-04-of-do in M. 2 at U.S. Phaled in cell-05-of-do in M. 2 at U.S. Phaled in Cell-04-of-do in M. 2 at U.S. Phaled in M. 2 at U.S. Ph

ondules between the time in major 2015 when I was first getting placed in cell-07-of-doin K. 2 at G. 5.10 and 3:00 and on the date in September of October of 2015. When I was first getting placed in cell-04 and 3:00 and on the date in September of October of 2015. When I know the Donahue Denni Marry of Lorn K. 2 at G.S. P., Stanley Williams, Smith, Brian Chumbers, Emmith Donahue, Denni Marry Theodor K. 2 at G.S. P., Stanley Williams, Smith, Brian Chumbers, Emmith Donahue, Denni Marry Theodor Donahue, Marris of John Doe No. 1. Mcclead on a John Doe No. 1. Marris Donahue Doe No. 1. Marris Donahue Donahue Donahue Donahue Donahue Donahue D

Ondules between the time in may or 2015. When I was first getting placed incell-06-of down K 2 at 6.6.2.

The mod 3:00 and he dute in September or October of 2015, when I was his getting placed in cell-04-of-down K-2
at 6.5. Probable I was experiencing is expere nous in your headaches and sever now bleeding, chest pun
and burning in my pears when I arinal all I Informed and but told Keurino. John Doe, Timmer
man, O o borne, and some mure John and June Doeu), Stunley William 5, Briun Chumber 5, 4 bout-

The pain, and serious medicalls suew a round my chest, genital, and I showed Brunchumber Osboine. Keurins or JohnDoe, Zimmerman, williams the blood on the towallstrate, had, and thrent for my serious medical need, which is described in this paragraph. White a suffer more pain, and extience treaduches and pain because of the one or more grievance.

Everyday betweenthetime in may of 2015, when I was hirt getting placed in cell-05-of-dorm K-2 at 6 & 17 through 3:00 c. m when I had based maneon collists and when I was first getting placed in cell-04-of-dorm K-2 at 6.6.1. everytime at 6.5.12 the extrevely filtry contaminated water shich was in the took tinside of cell-05-of-dorm K-2 at 6.5.12 sed range disconfoit, and to last and soils and or provide a rea parts of my battock of gent a last and or provide a rea parts of my body causing me Everydus tolows to battock of and soils on my gentally and for battock of the soil of the told of the collists.

Everyday today today today to menones and soles on my yenrequesting placed incer of of dorm Kaut G-3.P. through-3.00 a.mon the dutein september of Clober of 2015. When I was first getting placed incert of of dorm K-2. P. through which was in the tollet in cellor-of-dorm K-2 at G-5.P. adding urine to the walts the regular between 11 1 15.

Everyday between the time in May or 2015 when 2 was first getting places incelled 5-of-doint 2 at 6.5.P.

Through 3 look in an the date in September or October of 2016, when 2 was first getting placed in cell04-of-doin the dat 6.5.P. I had bowel move mention in the toplet in cell-05-of clorated
at 6.5.P. adding feces to the water and the letin cell-05-of-doin 10-2 at 6.5.P.

11.

On the dule of Obboine, Zimmerman, John Due, Jahn Doe? Dundson, and Harrie illegal Conductes of using excessive force on me between the Hand in may of 2015 when was 1:01 getting placed in (ell-05-of-dorm N-2 at G.J.P. I asked grand for green unce forms;

On the dutes between the time in may of 2015 when I was first getting placed in cell-OT-of-doing K-2 at 6.5. P. and October 03, of 2015, Ilwas not allowed access to the greenance appeal-getting placed in cell-OT-of-doing getting getti

Unthedule, in December of 2015, when zimmer man, grabled and/or shoved and/or purhed repeatly but excessive force. Zimmer man, and Juyce and some mune John Decess intentionally denied so I could make a complaint a zimmer man actess to the grievance procedures sind process

Indutes between the time in mayordors, when I caus first getting placed incell-05-of-dorm's act 6.5. p. and 3:00 aim on the dutes of september or october or 2015, when I caus first getting placed incell-04-of-dorm K-2 at 6.5. f. I Complainted to brian Chambers with getting placed lamptill. Hall, Obberne, Zimmer man, Emmit Denahae, Stantey williams. Alten Davidson, House, Sharp, Sharp, West Hallowsky, Sharp, Serious medical and the control of the sharp placed in the time in may of 2015. When I was first getting placed in cell-05-of-dorm K-2 at 6.5. P. and 3:00 aim on the dule in September of oto be ordored when I was first getting placed in cell-04-or-dorm K-2 at 6.5. P. I notified Stantey Williams, Brian Chambers williams, Sulliams, Hill, Hall, Obberne, Zimmer man, Emmit Denahae, Dennis Murry Williams, Sharp, Sharp,

of-doin N-2 ut G-8.P.

At all times from the time in may of 2015, when I was first getting placed in cell-05-of-dorm K-24 G.S.P. through 3:00 ain on the date in September or October of 2015, when I wasfird getting placed in cell-09-or-dorn K-2 at G.S.P. , the took and cold running water system to the sink inside of cell-us- or-dormk-2 al G.S.P. was broken and did not run any water.

Afalltimestrom thetime in may or 2015 when I wasterst getting placed incell-05- or down K-246. S.P. through 3:00 arm on the date in September or October or 2015, when I was first getting placed in cell-09- of-doin K 2 at G.S.P. I had no access to a sunitary toilet therefore prevented me busic human needs and/or need

On the dule in mayor 2015. When I was first yetting placed in cell- 05-of-dorm K.2 at b. S.P. there was one or more cello aritable at 6.5. P. I filed a grisamine form relevent cell-or reservant of the condesport of

upon information and belief on duke between the time in Movember of 2014, when I was first getting placed Making terrous threats to me that they was gointo lell me when they get an opportunity upon information and holing are the they are sure points lell me when they get an opportunity

upon information and belief on a date the time in November of 2014, when I first filed a green act Gas, P and December 28, of 2014, fulse information which was related to me was placed in one or more documents because of the grievance form that I filed in November of 2014 at a.s. P. Refer to ExhibitAt

On a duke between November 16, of 2014, and December 28, of 2014, while I was Incell-07-of-dormk-2ut G. 8, 14. Brian Chambers, came to cell-of-dorm k-24tG. Sip with one or more of the documents which Contuined the fulse information which was relided to me, and while Brian Chambers was at cell -Ol-of-doin Kack G.S.P. with the one or more documents which was related to me, I notife d , and Informed and told Brean Chumbers, the one or more documents which was related to me conta-Ined fulse information whichwas related to me, and Brian Chumbers stated to me FUCK YOU, and Sign the paper, we are going to punish you and keep you on the tier two 12) program, every op Portunity we get since you lited a grievance for m complainting

afair and and belief, the time in may or 2015, when I was fritgetting placed in cell-05-01-dointed atos, p and actober 03, of 2015. Housler, Stuntey Williams, and some more John Doess and June Duely Intentionally denied me access to the grievance appeal procedure Ulfor the grievance formis I tiled betwee the time as described in this puragraph

K-246 (1.0 th most sign coveryday from the time in 2016, when I was first moved in cell-09-of-doing K-246.5.1. through 3:00 arm on the date of Octobe 18, 2016. I was forced and for subjected to live incicell with another immake who bearing a Department of Currections personnels) alleged as a Inmule who commit or lead other to commit violet, disruptive, predictory, riotions actional or other wise pose a serious threat to the sweety and security to the motit Whomal operation.

On a dule between November 3, of 2015 and December 15, of 2015. False Information which was reluled to me was placed in one or more documental intentionally because of the one or more grievance for mill that I filed between the time in November of 2014, When I first Till a grievance form at 6.3. P. and October 27, 012015

On a duk between November 01, of 2015, and December 15, of 2015, while I was incell-04 of darm K-2 at G.S.P I info, med and notified, and told Zimmerman and Jayre that fulse information which was reliable to me was G. 5. Pundwhile my aims and writes was restrainted zimmer man grabbed and/or shaved and/or pushed me repeatly with excessive force, because of the one or more grievance formul that I filed between the time laborators about the time laborators about the time laborators about the time is borden being the first filed a grievance from all so Baild Now of the beautiful time is borden to the placed in one as more documents or led to Toyce, that labor information which was related to me placed in one as more documents.

onadde between June 30, of 2015, and Hugart 31, of 2015, while I was in my assigned cell indomn't 2 at 6.3. P Osburne, and John Due wed ged and objects repeatly with excessive for ele Wristis) with straips objects and objects repeatly with excessive for ele Decause of the grievance form to tobe lines of one or more the grievance I filed between time in movember or 2011 when 2 9711 tiled a grievance form at 6.3. Pand July 31, of 2015.

upon information and belief Everyday From the date in may softail, when I waithref getting placed in cell-05-of-dorm kid at 6.5.1. Through 3:00 aim the date in Seglember or doll, when I waithref getting placed in cell-04 of-dorm kid at 6.5.1. I was a sery ned to a lockdown unit, or dorm where, prisonens are lockdown at hour a daylexcept when being opportunition showers, with a weekly visites callowless medical or sich calless appointments etc.

On dules betweenthetime in November of 2014, when I first fileda greenere form at 6.6.8 and Uctober 1% of 2016 everytime, when, Osborne was getting ready to remove the restraints from around my wrists and/or arms osborne intentionally Equeezed the restraints into the skin of my arms and/or wrists with excessive force and made serious threats to me that he was going to kill me, because I made complaints on him and his Co world's.

on dules between the time in november of 2014, when I was first filed a green unce form at bible and October of 2016, everytime when, zimmerman was getting ready to remove the restrainful from arounding write and of arms, zimmerman intentionally of accept the restrainty into the skin of my corms would wrists with exceptive for ce and made serious threats to me that he was going to hell me because I filed a grievance form complainting on him and his corworder.

upon intermedian and beliefs Zimmer man, Obborne, John Doe, John Doe No 3, John Doe, Hairis, Dandson Megal conduction or asing excessive force and for physical abuse a gains was used muliciously and sadistically for the purpose of causing meharm.

Every day from the duke in movember at 2014, when I first filed a grievance form at 0.5, & through October of 2016, I was denied protection— Custody for my swety, because at the one or more grievance form that I lited between the time movember of 2014 when I first filed a grievance form at G.5, & and October, rotdolf

aponinformation and belief between hugait UI, of 2013 and April 10, 2016, the muxium length of timeshat an offender can a could be assigned to the trev

On a duk in June of 2015, Brunchumber Cume to cell-05- of dorm N. 2 at 6 5.8, and while Brunchumbers was at cell-05-01-dorm 11 2 at 6 5.18. I repeatly NOT; (1-ed and wintermed and/or told Bruin Brunchumber about the faces and arine of same are 5 else's and/or another person, being in the tailet in cell-05-of dorm 12 at 6 5.18 and Brian Chumbers stated to me FUCK YOU, are are not thelping you since you liked threm greenince formal complainting and sign this paper and on the same duke as described in panyangh Bruin Chumber in leationably placed late information in one or more document which was reliable to me, be cause I filed the one or more grievance form be tween the time in November of 2014 When I following form of 65.8 and April 24, of 2015.

On adute between June 01, of 2015, and June 08, of 2015 while I was in cell-05-of day mk. 24 6.5. P I complicated to Stanley Williams and Smith that Brian Chamber, and Same of the stall member was retalisations against me and that I was subjected and exposed to rece s and urine of an of the person and or some one belse's satside of my tolet incell-05-of down K2 at 6.5.1 and Slan ley williams and Smith Shitel to me Word an't give a Fulk about your conditions since or more downent which was related to me On dales between the time in mayor 2015 when I was first getting placed in cert-us - of -doing K-2 at 6.8. P. and 3:00 ain on the dak in September of October of 2015 when I was first getting placed.
Incell-04-of-doing (-2ct G.S.P. I notified), and informed Stankey Williams, Dennis Mainly Houster, Emmitt Dona hae, Toyce, Balkert, I change & Smith, Davidson the filthy ansantary conditions
in cell-05-of-doing K-2 at 6.5. P

On duke between the time in inaget 2017, when I was first getting placed in cell-05-of-darm X-2 of cist, and 3.06 yim, on the date in september or October of 2015, when I was first getting placed in cell-04-of-day m K-2 at 6.1.1 I had nobe bleed by the which the s, be came dizzy subtred woman need or land because or conditions or my consinement of being denied adequate drinking and busic human sound from the date in may of 2015, when I was first getting placed in cell-05-of-day m K 2 at 6 s.P. there was the date in September or October or 2017, when I was first getting placed in cell-05-of-day m K 2 at 6 s.P. there was the stench odorus of my sitting was first getting placed in cell-05-of-day m K 2 at 6 s.P. there was the stench odorus of my sitting was and seces in the twist incell-05-of-day m K 2 at 6 s.P. which I was exposed until ou costined in

and brusses to my aims and wests when he used excessives need across.

cond brustes to my arms and wrates when he used excessive suced against.

although the date between June 30 and to le nent to this case and relevent to this camplain of my right arm and writ with the sharps and objects, obtaine caused me serve such to my light arm and wrist and extreme main

Ight arm and wrist and extreme pain,

Color and relevent to the care and relevent to this camplaint and relevent to the issue

C.S.P. and 3id in the dule in September or October of 2015, when I was this getting placed in cell-04-if

dorn K. 2 it. While I was experiencing nose bleeding, servere theacheached), pain in

Shamach, se vere chest pain and crumple and blood in my dring lation, I notified and informed Brain

Chumbers, Zimmermun, Smith, Emmit Donahue, Williams Rilen, John Doell Guardist Jane Doe, Shoemuker, and Branchowhs

Zimmermun, Smith, Emmit Donahue, Williams, Allen, John Doell Guardist Jane Doe, Shoemuker, and Branchowhs

Irectment which audit me to sufer more extreme pain, a chest pain, no se bleed they whood pain medication for these

Injury as described in the graph and their grain was done for pain and relevent to 2 im mer man actionally a

Detailes between the time in Howember of 2018. when I first filed a grieve inceto. m. at 6.5. P and October 18:012016, when Zimmer man, Osborne, ased the excessive force and physical abuse as levent to this air and Osborne, caused and sunses to my arms and wist inthe dates between the and research to desind ant 3 Zimmer man and osborne actions and october 18:012016, everytime Zimmermana osterne, used excessive force and physical abuse me Zimmermana osterne, used excessive force and physical abuse me; Zimmermana osterne, used excessive force and physical abuse me; Zimmermana osterne, used excessive force and physical abuse me; Zimmermana osterne, used excessive force and physical abuse me; Zimmermana osterne, and osterne, but allowed cits, brysie, to

Relevent to this calcand complaint on the date inhen osboin e and John Doe Cittedgwed geogrand Striking, my right, and with sharp objects, obborne and Stime more of the Stull member at G.S.P. Intentionally denied me access to the grievance procedure when I requested a giverance form.

Alban instruction and bills, Eurydly, between thetime inthuy of 2015, when I was thist getting placed in cell-05-of-dorm K2 at G.S.P. Through 3/01/2 monthedate in September 600 do be of 2015, when I was first getting placed in cell-04-of-doinn K2 at G.S.P.I was tomed and ethable with about incell-05-of-domain-2 at G.S.P.I

Also relevent to this cuse and complaint, the conditions of my continement was extremely uncomfortable and extreme discomfort and pose areabetuntial and exexcessive risk of serious harm to mytreith and/or sufety and Defendantsubjected me to unnecessary and wanton infliction of pain.

Case 6:16-57-001248-VENHTROB DOCUMENT 1 Filed 19/24/16 Page 11 of 20

LEGAL CLAIMS.

Plaintiff reallege and incorporate by reference paragraphs throughout and or this whole Complaint and or Plaint Me alleye and in corporated by Fe Perence parayraph 1 - 184.

### DELIBRATE INDIFFENCE: EIGHTHAMENDMENT YTOLATION

87.

Desendant Stunley Williams acted with delibrate indifference to my health and/or swely and stunley. Williams actions and/or action violated my rights under the Eighth Amendment to the United State 8. Constitution and caused me puin smallering, physical injury and emotional distress and constituted a tort of n and violated my myrights under the state Law and or Laws of Georgia

Desendent Dennis Marry acted with delibrate indifference to my beauth and for sweety and Dennis Mar Try actions and/or action violated my right under the Eighth Amendment to the United States Const. tilulian and caused me pain, suffering, physical injury and emotional distress, and constituted a tort or new productional realists day regions under the state was and or Law or Georgea.

Desendant Emmitt Donahue acted with delibrate indifference to my health and on, swely and Emmitt Donahue actions and/or action violated my rights under the Eighth Amendment to the United States Constitution and caused me pain, suffering iphy sicul injury and emotional distress, and constitution and caused me pain, suffering iphy sicul injury and emotional distress, and constituted a tort of the member and violated my rights under the state Luw and for Luw of Georgia.

Deservinted in the manufacture and violated my rights under the state Luw and for its interest and constitution and violated my rights under the state Luw and for its interest and constitution and consti

Defendant Smith caked with delibrate indifference to my treath and/or safety and defendant 6 mith action & and/or action violated may have delibrate indifference to my treath and/or safety and defendant 6 mith action & safety action & safe physicalingury and smotional distress and constitutes atort of ddibuter industrial and realists my rights under the State Law and for Laws of Georgea

Describent Toyce acted with delibrate indifference to my health and/or salety and describent Toyce action and/or actions toyce acted with delibrate indifference to my health and/or salety and described my rights under the Eighth Amendment to the United States Conflicted my rights under the physical mijury and emotional distress and constituted atort of delinarious and violated my rights under the State laws and for Law of Georgia

Desendant Davidson acted with delibrate Indistrience to my treatth and so Eusely and desendant Davidson action and coursed me or action violated my rights ander the Eighth Amendment to the United States Constitution and coursed me Dan cultures and rights ander the Eighth Amendment to the United States Constitution and coursed me Dan, swiering physical injurandemotional distress and constituted a tool of detacher and violated myrights under the state limbondfor limbol Georgia,

Desendent Brian Chambers acted with delibrate indillerence to my healthand or satety and delendant & Mun Chumbers, actions and waction violated myrights under the Eighth Amendment to the United States Constitution and couled me pain, swiering, physical injury undemotional distress, and constituted a took of address addition and invalided my rights under the Staw Laws and/or Law of Georgia

Desendant Osbane acted with delibrate indifference to my healthand for sweety and desendant Obsborne actions and/or action violated my rights under the Eighth & mendment to the United States Contit, ation and caused me pain, swifering, physical injury and emotioned distress, and contituted about aided knowledge and understand of the contituted

atost ordered under object on the state Laws and lor Law or Georgea Desendant Stice matter acted with delibrate indillerence to my health and/or safety and & Sendant Shoemaker actions and/or action violated my right under the Eighth Amendment to the United 5-tates Constitution and course me pain, swiering physical injury and emotional distress and constituted adopt ordering and under the state law and/or Laws of Georgia

Desendant House acted with delibrate Indillerence to my treath and/or swety and desendant Housier actions and or action violated myrights under the Eighth Amendment to the United States Countries and in a state of the United States Constitution and caused me pain, suffer ing physical Injury, and emotional distress and constituted a text of destroid induscriand violated my rights under the State Line and for Line of Georgia.

Defendant Zimmer man acted with delibrate indifference to my health and/or sciety and desendant Zimmerman action and/or actions violated my rights under the United States Constitutionand constituted me pain, suffering physical injury and emotional distress and constituted atort of delinkindilloun and voolated my rights under the State Lawardor Law of Georgia

Desendant Allen acted with dibbrake indifference to my treath and/or sweety and desendant All-Pain and a cations violated my rights under the United States Constitution and cause me Pain, sweering, physical injury and emotional distress and constituted atout of de

Horderndillering and violated my rights under the State Law's andlos Low of Georgia.

Defendant marty Allen is acting with delibrate indillence to my health and/or swity and dele Adant Marty actions and for action & violating myrights under the Eighth Amendment to the United States constitution and courses me pring suffering physical injury and emotional distress and constitution at a tast architectually, and is violating myrights under the state Lawardlocker 61 Geory lu

Desendant Harold Flower tacked couth delibrate Indillerence to my health and/or swely and desendant Harold Flower actions undlo action 15 violating my right, under the Eighth Amendment to the United States Constitution and racesed me puinisusering physical Injuir and emotional distiess.

Doendant Williams acted with delibrate indulence to my health and los sweety and desendant W Mums, actions and lar action ribled my rights undo the Eighth Amendent to the United States Constitution and coursed me pain, sillering, physical injury and emotional distress

Desendant Rober & Tooles with delibrate indifference to my health and/or swety and delendant Robert Tooles actions and actions and a action is violating myrights under the Eighth Amendment to the United States Constitution and Coursed me pain, swiering, physical injury and emotional distress

Desendant John Due I greezence coodintor who name I'm unsure of

Desenbuni July Die 2 greennie stall member who name I'm unsure of

Delindunt June Doe who nume I'm unsure

Desendant John Die Who nume I'm unsure

106

Defendant June Due who nume I'm unsure of

107

Desendant June Doe who name I'm unsure of 108.

Desendant June Doc Who Mume In Unsure of

### RETALINITION - FIRST AMENDMENT VIOLATION

Describent Stunder william retail a techagainst medicalised a grievance about conditions or my confinement and Stunder williams action andly action violated my rights undo the First Rosendonent to the united Studes Constitution and constituted a stude of camp of horsessment and violated my rights and of the stude has a fundament of Georgia and conditions of my confinement Describent Brean Chumber retailuted accessor we because done me shing a greature form about conditions of my confinement and describent Brean Chumber and a certain violated my rights under the First Amendment to the United Studes Constitution and describent Brean chumber and local and conditions and local accessor and local action violated my rights under the First Amendment of the First Amendment to the First Amendment to the First Amendment to an action of the united Studes and end to action of the united Studes and retail and a modifical first and access to the first Amendment to and retail and a modifical first and access to the first access to the fi

Desendant Usbane retaliated against me because I fileda grievance about conditions of my confinement and Desendant Osbar se actions and/or action violated my rights under the First Amend ment to the united States Con Statutuleon and caused me pain, switching, physical injury and emotion distress

Emmitt Donahue netalialed againil me because I filed & greenance forms, about conditions of my continenent and Emmitt Donahere actions and or action violated my rights under the First Amend ment to the United States Constitution and coursed me pain, suffering, physical injury and commonal distress

Maity Allen retaliated against me because I siled a grievance form about conditions of my continement and Marty Allen actions india action violated my rights and the First Amendment to the United States Constitution and caused me pain, suffering physical injury and emotional distress

Desendant Zimmerman retuluted against me because I filed a grievance formabout the conditions of an allowers and and Interest and action violated my rights and the First Amendment to the United States Constitution and caused me pain, swiering, physical injury and emotional differs

Describent Smith retailed against medecause I filed a grievance form about conditions of my contineers ent. and Smith actions and/or action violated my rights under the First Amendment to the united States Constitution and caused me pain, concerns, physical injury and emotional distress.

To send and Tours and like the pain, concerns, physical injury and emotional distress.

Volendant Jayce retainted against me because & like a greenence form about conditions of my cantinenent, and Joyce actions with your action violated my rights lander the First Amendment to the United States Constitution and coursed me pun, suffering physical intogrand emotional distress

Desendant Housier retainated against me because \$ lited progressions for mechanistion of my can interpretate and desind and the first Amend, continuent and desindant Housier actions and to action violated my orights under the first Amend, ment to united states constitution and caused me pair, sweetings physical injury and emotioned distress

Desendant Kearins retaliated gains me be cause I filed & grievance forms about conditions of my cantinement and hearins actions and water and aled my rights ardier the First Amendment to the United States Constitution and waved me pain, swiering: physical Injury and emotion distress

Decedent Deanis Marry retainterigated me because I filed a greature forms bout conditions of ony continement and decend and Dennis Murry action sand for action violated my rights under the First Amendment to the United State Constitution and caused me puin, suicring physical many and emotional distress.

injury and emotional distress

Dendual Dundson retained tech, against me because I filed a grievance forms about and it is moder or my continements and decodent Duridson exclusion ind/or action violated my rights under the First Amend ment to the United States constitution and caused me pain, suffering physical injury

Describunt Hurris redulated against me because I filed a greenince for a about conditions of my continement and describant farms action and/or actions causes me pair isothern, and violated my right under the first Amendment to the United Studes Constitution and coursed me physical Injury and emotional distress

122 Desendant Brian Owens retaliated against me because I shed greening form about con diffusion of my continement addressed and Brian owers action uniteraction violated my a yet andor the First April menent addressed Brian owers action uniteraction violated my a yet and the First Amond ment to the united States Conit I tuledon and coursed me pain, swierry ip bysical Injury undemotional gestiers

Describent Zimme mun used excessive muliansly and said for the purpose to caused me harm and 2 immemor action violated my right cando the Eighth Honordment to the United States Constitution and caused on phy sical injust

Desendant Davidson acted with delibrate indifference to my health and or sweety anadoling on Davidson actions and oraction violated my rights under the Eighth Amendment to the United States last their and soused meinjurys, physiculinjury, puin swierry iphysical injury and emotional distress

Desendant Hurrisacled with delibrate indifference to my health and safety and desendant Hurrisacled with delibrate indifference to my health and safety and defendant Hurris action violated my rights under the Eighth A mend mend to the united Stutes Constitution and could me pain, sullerin). physicaling unx und emotional distress 6

Desendent Allen acted with Delibrate Induserence to mithealth and for salety and defendant Affence tion and constitution and could be pain, physical injury. Sovering and the United States Constitution and coursed me pain, physical injury. Sovering and employed and and a state of the United States Constitution and coursed me pain, physical injury. emotion and distress

Desendant Allen acted with adibiate indifference to my health and/or sucty and desendant him desendant Allenaction and for actions violated ways and the Eightiz kneedment to the United States Constitution and coased me pain, side eight physical injury and emotional latestics

Defendant williams acteurittelibrate indifference to my health and for sweety and descendent with the field mendment to otionulclistress descondunt williams action color action colored by rights under the Eighth Amendment to the United States Country action color action colored by rights under the Eighth Amendment to the United States Country actions action the United States Constitution and accounted me pain, swice in physical Injust and end

emotional distress At alltimes between May 28,042015 and Janus, of 2015. I was very made about my Truing conditions in cell- 06-01-damk-2 at 6.5.P. Also relevent to this core I completed phusedoi the trei two program.

130

Everyday and Every night between the time in may of 2015 wheat was first getting placed in cell-05-01-down to a Color of 2015 when I was first getting placed in cell and a color of 2015 when I was first getting Pluced in cell-04- of-dorm K 2 attis, P. I suffered digthroat, dizzness, hight sweets because was not all an access to granking water of wild the fill bim

Describer Tohn Doe who have I'm unsure of

## DISCRIMONATION FOURTEENTH AMENDMENT VIOLATION

Defendant Stanley Williams subjected me to discrimination and treated me very difference than Mast inmaterial and desendant Stanley Williams action and for action violated my rights under the Four terenth Amendment, and coursed me pain sullermy, physical injury and emotional distress

Defendant Zimmerman subjected me to discriminations and treated me very difference than most inmates and tothe deendant Zimmerman actions and/or action violated my rights under the Fourteenth Amendment to the United States Constitution and caused me pain suffering physical injury and emotion distress

Deendant Marty Allen subjected meto discrimination, and treated me very difference than mustin mutalland defendant Marty Allen action and/or action violated myrights under the Fourteenth Amendment and caused me pain, switching, physical injury and emotional distress

Desendant Stantey Williams subjected me to discrimination, and treated mevery difference thaner the Fourtonal moderno me to assumment and or actions violated myrightound er the Fourteenth Amendment, und caused me pain, sullering, physical injury and emotion

Desendant Osborne subjected meta discrimation, and treated me very difference than most inmake Whand desendant Osboine actions under author violated my rights under the Fourteeth Amendment to the United States Constitution and coursed me pain, suffering, physical injury and emotional districts and constitution and consections Fulse Improsonment and violated my Hight and the state Law of Laws of Cearmin.

Defendant Smith subjected me to discrimation and treated mevery difference than multinmaker) United Children Smith action a and/or action violated myrights under the tour kenth Amendment to the United States Constitute on and caused me pain, switching, physical injuryand emotional distress and constituted and envised me pain, switching, physical injuryand emotional distress and constituted and envised Huled one unme Tortaror False in personment and violated my right under the State law andle. Law of Geory a

Defendant Homer Bryson subjected me to biscrimation and treated me very difference than must immutebe and detendant Homey Bryser action and a actions violated my rights under the Fourteenth Amendment to the United States Constitution and causes me pain, switering, physical injury and emotional distress and Eurost ful Bod and a more forter of Fulse imprisonment and violated my rights under the state Law and for Lawor Georgea

Desendant Harlod subjected me to discrimination and treated me very disserve than most inmakes and desendant Harlad Howers actions and for action violated my rights under the Fourteenth Amendment to the United States con 11th hun and caused me, pain, swier my, physical injury and emotional distress and Canotituled one or more torks of False imprison ment and violated my right ander the state Law ancho Lawol Georgic

140 Desendent Maity Milen subjected me to discrimation and treated mevery difference than most innules and Delendant Marty Milen actions unclin violated myrights under the Four teenth Kmendment to the United Stutes Constitution and caused my pringering physical injury and emotional distress and constitution are common toits of Fulse'in prison ment and violates my rights under the Statecture and for Lawri Common Common toits of Fulse'in prison ment and violates my rights under the Statecture and for Lawol Georgia

Emmit Donahue subjected me to discrimatation and treated me very difference than most innutes, and Emmitt Dunuhue action andles action violated my rights under the Fourt eenth Amendment to the United Styles Constitution conducuace a me puin, surfering Physicalinjury and emotion aldistiess

#### STATEMENT TO CLAZMICONTINUED LEGAL CLAIMS

Desendant Musty Killen Bubjected me to chip icul and sign ficant haidship and desendant musty Allen actions under action of violated my rights under the Four teenth Amendment to the united States Constitution and Coursed me poin, surering physical injury and employed distances deserted Amendment to the United States Constitution and coursed me poin, surering physical injury and employed distances. in jury and emotion cl distreis

Defendant Stanley Williams subjected me to atypical and significant hardship and defendant Stanky Williams actions and for action violated my rights under the Fourteenth Amendment to the United Stanky Williams actions and for action violated my rights under the Fourteenth Amendment to the United States Constitution, and caused me pain, sulering, physical injury and emotional distress

Defendant Brean Chambers subjected me to atypical and significant hand ship and defendant Brian Chambes actions and/or action violated my rights under the Fourteenth Amendment to the United States Constitution, and caused me pain, sullering, phy sical injury and emotional distress

Delendant EmmittDonahue sub recledine to atypical and significant hard ship and desendant Emmi ett Donahue actions and/or action violated my right sunder the fourteetth Amendment to the United States constitution and couredme pain, swiering, physical injury and emotional distress

Desendent Smith, subjected me to atypical and significant hard ship and desendent Smith autron and actions violated myrights under the Fourteenth Amendment to the United States Con Stitution and caused me pain, subtering, physical injury and emotional distress

Desendant Dennis Mury subjected meto at pical and significant hard ship and desendant. Dennis Murry action and for actions violated myrights under the Four teenth Amendment to the United States Constitution and course me pain, swiering, physical injury and emotional gizzlesi

Delendant Zimmerman subjected me to atypical and significant hardship and delendant. Zimmerman actions and locaction violated my rights under the Four teenth Amendmentto the united States constitution and coused me, puin, swiering, physical injuryand emotional distress

Description of Supject me to atypical and significant hard shipand agendant asporas actions and/or action violated my rights under the Four teenth Amendment to the United States Constitution and coursed me, pain, suffering, physical injury and emotional distins

Describent Sharmaker subjections to at spical and significant haid ship and describent Sharmake adions and for action violated my rights under the tour teenth Amendment to the United States Constitution and caused me, pair, sollering, physical injury and pemotional distress Desendant Sharp subjected me to atypical and significant hardship and desendant Sharp act-landnator actions violated my rights under the tour kenth Amendment to the United States Constitution and caused me, pain, suffering, physical injury and emotional distre

Desendant Kearnseubjeded me to ctypical and eignificant hardehip and desendant Kearins advantant undated my rights ander the tour teenth Amendment to the United States Constitution and caused me, pain swiering, physical injury and emot 10my/distress

Desendant Juyce subjected me to atypical and significant hundship and desendant Juxce actions orward raction violated may rights unite the Eaglithen Aborentment and or Four beenth Amendment to the united states constitution and courses me pain, swilling i physical injury and emotional distres Case 6:16-cy-00143-18H-BSB Document 1 Filed 10/24/16 Page 17 of 20

Describent John Doe who nune I'm uniwe or

### DUE PROCESS - FOURTEENTH AMENDMENT VIOLATION

Defendant Brian Chamber blacked my assigned to greenance precedence and dict not give me any a new my and brain Chamber actions whited my rights under the Four teenth Amendment to the United Starks Constitution

Deendunt Hame Brysun did not give one any notice to any any changes to policy and rules, and Home Brysus action violated my rights under the Fourteenth Amendment to the United States Constitution and Cyuled me pair, survey physicial in jury and emotional distress

Desendent Stunden williams did not give meany notice of any changes to policy and rule rand Stundey Williams action Violated my right to the United States Constitution and course me point physical injury remotional distress

Desendant House denied me access to the greenance appeal procedure and did not give means notice of any chargey to a recommone policy and or rules , and desired and four ter action violated one rights under the tour lee nith homeudment to the united States constitution, and coursed me pain, physical judget emotional districts

Defendant Lee chenned me a ccess to the greenance appeal procedurers and did not give me any notice or any changes to one or more policy procedure and in rule and Defendant Lee a ction violated mp or just and the Four teenth themendment to the united States coast itution and coursed me pare, suller, physical history and emotional district

Also relevent to this case and complaint the are John Does and June Dues described who I unsure of who numes assure of and I would to Ament at alater time if possible.

I'm still assigned to cell. 05- of-down K-2 at G.S.P. Musty Allen Homer Bryson illegal conduct is descrimation V.S. Causing me my changes for parole, and not being able to take classes I'm negwired For purble, ree Extribit 3.

The plaintit has no plaintills adequate an complete vernedy at how to decire? I the wrongs described herein, Plaintill has been and continue to be tre parably injury by the conductor the desendants unless this could grants the declaration yields grantile relief which plaintill see is

Relevent to this case and complaint. At all times trum the time in Mayor 2015 when I was first getting placed in cell-05-01-darmk-2 at GSCP through 3:40 aim on the dale inseptember of 2015 when I was first yetting placed in cell-04-01-darm k. 2 at G-SCP: The conditions & of cell-05-01-darm k. 2 at G.S. K. unconstitutational.

### STATEMENT TO CLAIM (Continuous) LEGAL CLAIMS

EXCESSIVE FORCE EIGHTH AMENDMENT VIOLATION

Defendant Zimmer man used excessive force against me when I was not breaking any of the actions ruleis) and when I was not acting disruptively and desendant Zimmer man action and be pain, swiering my rights under Eighth Amendment to the United Stutes Constitution und coursed me bain, empering by 181. Injury and emotional grotiess

Defendant Osbane used excessive force against me when I was not breaking any of the prison rules and when I was not action disruptively, and defendant Osbarne, action and and coured me pain sines and endesting the Romend ment to the United States Constitution and coured me pain sines. and caused me pain, owhering, phymeral injury and emotionally distress.

Defendant John De used excessive force against me when I was not breaking any of the Prison rules and when I was not acting dist uptively and desendant John Due action and/or actions violated my rights ander the Eighth Amendment to the United States Constitution and caused me our action and caused me pain, sustering, physical injury and emotional distress.

Defendant Harris ased excessive force against me when I was not breaking anyof the prison rules under the Eightha montain disruptively and defendant Harris action and or actions violated my inglots and extended the Eightha montain a physical under the Eighth Amendment to the United States Constitutional decaused me pain, suffering, physica !

Defendant David somused excessive force against me when I can not breaking any of the prison rules 168. the Eighth not acting district introduction and Dankmention and on action violated my rights under the Eighth Amendment to the United States Constitution and caused me pain, sweeting, physical in Jury and emotional distress

Desendant Zimmerman used excessive force against me when I was not breaking any of the Prison of rule and when I was not action disruptively and desendant Zimmerman action and (or action) Violated morning to the control of the cont Du'n surround white lighth knowling and to the United States Constitution and course me pain, swierra), physicalinjus, and emodional distress. Reser to extubit 3.

Bendant Osborne used excessive force against me when I was not breaking any of the prisonismule and when I was not acting dirruptives and defendant Osborne action and or actions violated my rights under the Eighth Amend ment to the United States Constitution and courses me pain, sullering 1 physical injury and emotional distress

Desendant John Doe No. 2 Used excessive force against me when I was not breaking anyof the prison rule and when I was not acting disruptively and deendant John Due No. 2 action & woulder action violated myrights holler the Eight & Amendment John Canstitudion and Caused me pain and swiering, physical and employed at distress

# STATEMENT OF CLASSY continuoced PRAYER FOR RELIZE REQUESTED

WHERE FORE, pluintiff respectfully pray that this court enter judgement granting plaintiff;

A declaration that acts and omissions described herein Violaled plaintiff rights under the Constitution and laws of the United States

A preliminary and permanent injunction ordering desendant Harty Allen. Nathan Deals. Homer Bryson, give me the same opportunity that they give most inmales who complete phase 3 of the tier two(2) program

Apreliminary and permanent Injunction order decondant Marly Allen, Nathan Beaf and Homer Bryson burring me from any future tren (21 program

Compensatory damages in the amount of \$130,000 against

Puntive dumayesin the amount of \$ 30,000 against each describant jointly and severally

Plantiff seeklipuntive dumujes in the amount of \$30,000 against Each desendant jointly and severally

Plaintill SeeNUs compensatory dumages in the amount of \$30,000 against each desendant isolatly and severally

### STATEMENT TO CLAZM (CONTINUCE)

PRAYER FUR RELIEF REducated continued

Plaint Al Clayton also seeks a just trial on all issues triable by jury

Plantiff Chayton also seekin recovery of his cost in this suit, and

Plaintiff Chaptan also seekes an ordeinegairing desendants to cease their dis

Plaintiff Chayton seeks an order for an preliminary injunction and a tem porany Restraining order requiring defendants from placing me on thetier 2 program

Plaintiff Clayton seek an order requiring desendants to treat me the same as they treatenoit immuters who complete phase 3 of the tier 2 program

Plaintilt Clayton seek an order require desendant to place me on Protective and/or Protection Castody for my sweety or Give me the same of portunity(s) as most inmutes who complete phase 3 of the tier two (2) Program

Date: October 18, 2016
Respectfully submitted
Eurnest Clayton / Eurnst Clayton
Georgia State Prison
300 1st Ave South
Beids ville, Georgia 30453